

Response to Grizzly Bear Core Concerns

The USFWS and DNRC responded to concerns about grizzly bear security core in the Final EIS, Appendix G, page G-73 in our response to Letter 12, comment 127. We also note that the information provided in that response was not accurate. We reported that "... the proposed Stillwater transportation plan proposes reconstruction of existing roads or use of temporary roads to access timber stands and would construct only 2 miles of permanent road in this Stillwater Core over the Permit term, further minimizing effects of roads in the core area." However, this is not the case. DNRC would construct 12 miles of new road in the Stillwater Core over the permit term.

In supplement to the information provided in our response to this issue in the Final EIS, we note that the Final EIS includes an analysis of secure habitat on page 4-341, Table 4.9-15. This table shows that overall in the Stillwater Block, there would be a net reduction in secure habitat by 12% and that three of the eight grizzly bear subunits would suffer a decrease. Additionally, because landownership in the Swan Valley has changed from Plum Creek to TNC, we anticipate that changes in secure habitat would be more similar to those depicted in Table 4.9-15 for the no action alternative under the Swan Agreement. Since publication of the Final EIS, we have begun preparation of the Section 7 intraservice Biological Opinion (BiOp). In our draft BiOp, we have determined that the proposed management/rest scenario would provide bears adequate areas free from intensive disturbance associated with commercial forest management activities such that no incidental take is anticipated.

In response to the comment that *"the 4-year activity/8-year rest scheme in Stillwater State Forest should be rejected because 1) rest is not a surrogate for secure core because it has many exceptions,"* we note that the "exceptions" in rested subzones (30 days for commercial activities per year and allowable low-intensity activities) are the same as those allowed in secure habitat on National Forest lands. Additionally, the "exceptions" for salvage harvest that extend for more than 30 days require coordination with the USFWS, which is the same practice that occurs on National Forest lands. Therefore, we do not view these as departures from accepted practices.

In response to the comment that... *"4) The HCP characterizes adjacent Plum Creek lands as having "efforts to avoid or minimize take" and that "5) This approach has not proven to protect grizzly bears under the Swan Agreement."* We respond that we did not see where the HCP identifies or relies upon Plum Creek minimization efforts in the Stillwater State Forest to reduce potential effects on bears. The HCP does acknowledge the DNRC / Plum Creek relationship, whereby they jointly manage closed roads in the Swan River State Forest under the Swan Agreement. We note that these lands are now owned by TNC, who continues to cooperate with DNRC to jointly manage road closures. The management/rest scenario is successfully supporting population connectivity from the Swan Range to the Mission Range across the Swan Valley (Hicks et al. 2010). Bears also continue to use the Swan Valley. From years 2000 through 2006, 27 different bears were known to have spent time in the valley. While there have been high mortality rates in the Swan over the past several years, many of these deaths are attributed to development conflicts (i.e., management bears removed due to garbage and unnatural foods on private land, cabin break-ins, and traffic fatalities on Highway 83 etc.). The Swan Agreement is considered by the USFWS and DNRC to be an important conservation tool for minimizing risks to grizzly bears in this area, however, it was never designed or intended to address the many potential mortality factors affecting grizzly bears on neighboring private ownerships in the Swan Valley.